Stephen B. Watkins, Bar Number 3400 Armand J. Howell, Bar Number 10029 Benjamin J. Mann, Bar Number 12588 Paul M. Halliday, Jr., Bar Number 5076 HALLIDAY, WATKINS & MANN, P.C. Attorneys for Ditech Financial LLC 376 East 400 South, Suite 300 Salt Lake City, UT 84111 Telephone: 801-355-2886

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File No: 49473

IN THE UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF MONTANA

In re:

MATTHEW SCOTT RAGAN aka MATT
RAGAN LLC

Debtor.

Bankruptcy Case No. 16-61183 BPH
Chapter 13

OBJECTION TO PLAN AND
MAILING CERTIFICATE

[Filed Electronically]

Ditech Financial LLC, (referred to herein as "Secured Creditor") holds a valid Note and Trust Deed lien against Debtor's residence and objects to the Chapter 13 Plan of Debtor as follows:

- 1. The plan does not provide for Secured Creditor's pre-petition arrearage amount of \$137,650.81.
- 2. The plan is not feasible. The plan will pay approximately \$50,280.00, excluding Chapter 13 Trustee commissions and attorney's fees and costs and will fail to pay all of Secured Creditor's arrearages.
- 3. The plan should provide that Secured Creditor's trust deed lien and other loan terms remain in effect and are not modified except as expressly provided in the plan.

DATED this 31st day of March, 2017.

/s/ Benjamin J. Mann

Benjamin J. Mann

Attorney for Ditech Financial LLC

MAILING CERTIFICATE

The undersigned hereby certifies that true and correct copies of the foregoing Objection to Plan and Mailing Certificate were mailed by first class mail, postage prepaid, this 31st day of March, 2017, to each of the following:

> Matthew Scott Ragan 33 Wild Goose Lane Kalispell, MT 59901 Debtor

United States Trustee

Via ECF

Robert G. Drummond Via ECF

Chapter 13 Trustee

/s/ Benjamin J. Mann